



**ZUCKERMAN SPAEDER LLP**

201 SOUTH BISCAYNE BOULEVARD SUITE 900  
MIAMI, FL 33131-4328  
305.358.5000 305.579.9748 fax www.zuckerman.com

MICHAEL S. PASANO  
MPASANO@ZUCKERMAN.COM

October 15, 2003

**VIA FACSIMILE & U.S. MAIL**

April J. Sands, Esquire  
Federal Election Commission  
Office of General Counsel  
999 E Street, N.W.  
Washington, DC 20463

Re: **MUR 5357 – Larry Casey**

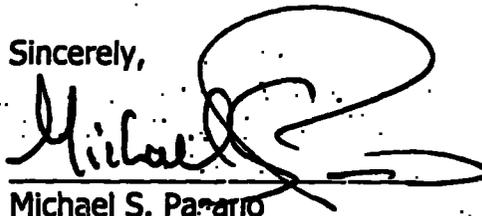
Dear Ms. Sands:

This submission is in response to correspondence from the Federal Election Commission ("FEC") dated September 24, 2003, advising that the FEC has found reason to believe violations of 2 U.S.C. § 441(f) have occurred. Mr. Casey continues to assert that he committed no violation of the Federal Election Campaign Act of 1971, as amended, and that his conduct was neither knowing or willful. Mr. Casey relies on the facts and arguments set out in his correspondence with the FEC in this matter, dated April 29, 2003. Mr. Casey urges, consistent with past FEC practices in similar cases with regard to people similarly situated to Mr. Casey, that the FEC decide to take no further action as to him, and that the FEC close this matter by reaching settlement and entering into a pre-probable cause conciliation agreements with Centex-Rooney Construction Co. Inc. and Centex Construction Group Inc.

Mr. Casey nevertheless accepts the FEC's offer to participate in negotiations and authorizes you to send to me a proposed pre-probable cause conciliation agreement. By agreeing to engage in this process, Mr. Casey reserves his right to submit in the future appropriate factual and legal materials relevant to the FEC's consideration of this matter, and does not mean to suggest that he will consent to conciliation. He simply wants to move this process along.

Please contact me if you have any questions.

Sincerely,

  
Michael S. Pasano

cc: Larry Casey, Esquire

2003 OCT 20 A 11: 19  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL

9262 904 40 52